

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR and NATALIE
ANDERSON,
Plaintiffs

Vs.

CASE NO.: 1:25-CV-00251

CRAIG DONAIS, RUSSELL HILLIARD,
DONAIS LAW OFFICES PLLC,
MARY K. DONAIS, UPTON HATFIELD
and AMY MESSER,
Defendants

**DEFENDANTS CRAIG S. DONAIS, MARY K. DONAIS AND DONAIS LAW OFFICES
PLLC'S RESPONSE TO PLAINTIFFS' EMERGENCY MOTION TO FILE REPLY TO
DEFENDANTS' OPPOSITIONS TO MOTION TO REMAND**

Craig S. Donais, Mary K. Donais, and Donais Law Offices PLLC (the "Donais Defendants"), by their attorneys, hereby provide their response to Plaintiffs' Emergency Motion to File Reply to Defendants' Oppositions to Motion to Remand ("Plaintiffs' Motion"). See *Doc. 24*. While the Donais Defendants advised Plaintiff Andre Bisasor that they did not oppose Plaintiffs' moving to extend time to file a reply to both oppositions to the motion to remand, see *Doc. 24, p. 13*, the Donais Defendants respond given the content of Plaintiffs' motion, which contains extensive argument regarding the motions to remand, see *Plaintiffs' Motion ¶¶ 8-49*.

Although the Donais Defendants advised that they would not oppose Plaintiffs' request for an extension, as demonstrated in *Exhibit 2* to Plaintiffs' Motion, the Donais Defendants oppose Plaintiffs' Motion to the extent it includes other arguments. Plaintiffs' Motion reflects that they did not need an extension at all but instead are using in bad faith a courtesy to make arguments well beyond the confines of not only a mere extension motion, but also a reply.

For all the foregoing reasons, Craig S. Donais, Mary K. Donais and Donais Law Offices PLLC, oppose the arguments in Plaintiffs' Motion, which is 70 paragraphs over 8 single-spaced

pages, beyond the request to which they indicated a lack of opposition, i.e., a 21-day extension of time to file a reply to oppositions filed to Plaintiffs' Motion to Remand.

Respectfully submitted,

FOR THE DEFENDANTS,
CRAIG DONAIS, DONAIS LAW OFFICES
PLLC and MARY K. DONAIS

Date: August 22, 2025

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was this day forwarded to all counsel via the Court's ECF system.

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Date: August 22, 2025

/s/ Linda M. Smith
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